

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket Nos. 360, 361, 605, 606, 624 &
625**

**NOTICE OF FILING OF BLACKLINE OF (A) MODIFIED FIRST AMENDED JOINT
CHAPTER 11 PLAN OF LORDSTOWN MOTORS CORP. AND ITS AFFILIATED
DEBTORS; AND (B) DISCLOSURE STATEMENT PURSUANT TO 11 U.S.C. § 1125
WITH RESPECT TO MODIFIED FIRST AMENDED JOINT CHAPTER 11 PLAN OF
LORDSTOWN MOTORS CORP. AND ITS AFFILIATED DEBTORS**

PLEASE TAKE NOTICE that, on September 1, 2023, the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the *Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 360] (the “**Plan**”) with the Court.

PLEASE TAKE FURTHER NOTICE that, on September 1, 2023, the Debtors filed the *Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 361] (the “**Disclosure Statement**”) with the Court.

PLEASE TAKE FURTHER NOTICE that, on October 24, 2023, the Debtors filed the *First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 605] (the “**First Amended Plan**”)

PLEASE TAKE FURTHER NOTICE that, on October 24, 2023, the Debtors filed the *First Amended Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Joint Chapter*

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [Docket No. 606] (the “**First Amended Disclosure Statement**”) with the Court.

PLEASE TAKE FURTHER NOTICE that, contemporaneously herewith, the Debtors have filed the *Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 624] (the “**Modified First Amended Plan**”).

PLEASE TAKE FURTHER NOTICE, that contemporaneously herewith, the Debtors have filed the *Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 625] (the “**Modified First Amended Disclosure Statement**”).

PLEASE TAKE FURTHER NOTICE that for the convenience of the Court and all parties in interest, a blackline of the Modified First Amended Plan against the First Amended Plan is attached hereto as **Exhibit 1**, and a blackline of the Modified First Amended Disclosure Statement against the First Amended Disclosure Statement is attached hereto as **Exhibit 2**.

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Dated: October 29, 2023
Wilmington, Delaware

<p><i>/s/ Morgan L. Patterson</i></p> <p>WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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